REMARKS

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1-64, 68-73 are currently pending.
- Claims 65-67 are canceled herein without prejudice to or disclaimer of the subject matter claimed therein.
- Claims 1, 22-64, 68, 69, 72 and 73 are amended herein.

Support for the amendments to claims 1, 22-64, 68, 69, 72 and 73 is found in the specification, as originally filed, at least at page 33. The amendments submitted herein do not introduce any new matter.

Claims 1-73 Recite Statutory Subject Matter Under § 101

Claims 1-73 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Applicant respectfully traverses this rejection.

Nevertheless, for the sole purpose of expediting prosecution and without commenting on the propriety of the Office's rejections, Applicant herein amends claims 1, 22-64, 68, 69, 72 and 73 as shown above. Applicant respectfully submits that these amendments render the rejection under 35 U.S.C. § 101 moot.

Cited Documents

The following documents have been applied to reject one or more claims of the Application:

- **Westcott:** Westcott et al, U.S. Patent No. 5,341,463.

Claims 1-73 are Non-Obvious Over Wescott

Claims 1-73 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Wescott. Applicant respectfully requests reconsideration in light of the amendments presented herein.

Independent Claim 1

Claim 1, as amended herein, recites (with emphasis added):

> A computer-implemented method comprising:
>
> providing a first texture map for a first portion of a three-dimensional surface, the first texture map being associated with a first mapping technique; and
>
> providing a second texture map for a second portion of the three-dimensional surface, the second texture map being associated with a second mapping technique that is different from the first mapping technique,
>
> generating **a multiple-component map set** that includes **at least a portion of the first and the second texture map**.

Applicant respectfully submits that Wescott fails to disclose, at least, "generating a **multiple-component map set** that includes **at least a portion of the first and the second texture map**," as recited in amended claim 1.

In rejecting claim 1, the Office acknowledges, and Applicant agrees, that Wescott does not explicitly teach "the second map technique is different from the first mapping technique" (Office Action, pg. 4). In that regard the Office takes position that Wescott suggests the use of projectors with different properties. The Office further provides the following analysis:

> Wescott's azimuthal, cylindrical projectors (column 1100, lines 26-36) suggests the use of projectors with different properties (e.g., figure 15, Equirectangular projection for the areas at the equator and figure 33, poplar orthogonal projector for the area at the polar-capped map). The motivation of using different projectors is the apply of well known projectors with different properties to yield a predictable result.
>
> (Office Action, pg. 4).

Wescott is directed to "display[ing] world maps from digital data, as well as to present[ing] user specific overlay data that are totally adaptable with regard to center point and area coverage" (Wescott, col. 1 lines 40-42). As illustrated in FIG. 7, Wescott's software provides a user perspective view of the earth when the user turns on the Perspective function in the Map Projection Features menu (Wescott, col. 6 lines 55-65). There are "19 available map projections [that] may be selected by the user and presented for any chosen center point and scale on the earth" (Wescott, col. 6 lines 55-65). FIGS. 12 through 33 show the possible capabilities of the software (Wescott, col. 7 lines 32-33). For example, FIG. 15 shows an equirectangular map of the world; FIG. 32 shows an equatorial orthographic projection centered on Hawaii (Wescott, FIG. 15 and 33). Accordingly, Wescott's software simply displays earth views corresponding to **individual** map projections. In other words, Wescott's software displays **a map set** by selecting **a single projection**. In contrast, the subject Application discloses a method

for "generating a **multiple-component map set** that includes **at least a portion of the first and the second texture map,"** as recited in amended claim 1.

For at least the reasons presented herein, Wescott does not teach or suggest all of the features of claim 1. Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claim 1 under U.S.C. §103(a).

Dependent Claims 2-21, 70 and 71

Claims 2-21, 70 and 71 ultimately depend from independent claim 1. As discussed above, claim 1 is allowable over the cited documents. Therefore, claims 2-21, 70 and 71 are also allowable over the cited documents of record for at least their dependency from an allowable base claim.

Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claims 2-21, 70 and 71 under U.S.C. §103(a).

Independent Claim 22

Claim 22, as amended herein, recites:

> A computer storage device providing computer instructions suitable for performing steps comprising:
>
> providing a first texture map for a first portion of a three-dimensional surface, the first texture map being associated with a first mapping technique; and
>
> providing a second texture map for a second portion of the three-dimensional surface, the second texture map being associated with a second mapping technique that is different from the first mapping technique,

generating a multiple-component map set that includes at least a portion of the first and the second texture map.

Applicant respectfully submits that Wescott fails to describe, at least, "wherein the map set includes at least a portion of the first and the second texture map," as recited in amended claim 22. Applicant relies on at least similar reasoning as presented above in support of claim 1, as applied to claim 22. Specifically, Wescott's software displays a map set by selecting a single projection; in contrast, the subject Application discloses a method for generating a multiple-component map set, which "set includes at least a portion of the first and the second texture map," as recited in amended claim 22.

For at least the reasons presented herein, Wescott does not teach or suggest all of the features of claim 22. Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claim 22 under §103(a).

Dependent Claims 23-42, 72 and 73

Claims 23-42, 72 and 73 ultimately depend from independent claim 22. As discussed above, claim 22 is allowable over the cited documents. Therefore, claims 23-42, 72 and 73 are also allowable over the cited documents of record for at least their dependency from an allowable base claim, and for the additional features that each recites.

For example, claim 24 discloses "the multiple-component map set is a three-component map set", "the second and third portion are two poles", and "the first portion is the area between the first and second portions," as recited in amended claim 24. Wescott, however, is silent as to any disclosure of this feature.

Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claims 23-42, 72 and 73 under §103(a).

Independent Claim 43

Claim 43, as amended herein, recites (with emphasis added):

> A computing device comprising:
>
> one or more processors;
>
> memory to store computer-program instructions executable by the one or more processors; and
>
> logic module configured to provide a first texture map for a first portion of a three-dimensional surface, the first texture map being associated with a first mapping technique and a second texture map for a second portion of the three-dimensional surface, the second texture map being associated with a second mapping technique that is different from the first mapping technique, the logic module being further configured to output graphically displayable information based on **at least a portion of the first and second texture maps.**

Applicant respectfully submits that Wescott fails to describe, at least, "wherein the logic module is further configured to output graphically displayable information based on **at least a portion of the first and second texture maps**," as recited in amended claim 43.

"All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). *See* MPEP § 2143.03.

In rejecting claim 43, the Office takes position that claim 43 is rejected under the same reason of claim 1-21 (Office Action, pg. 7). It appears that the Office does not

consider the words "wherein the logic module is further configured to output graphically displayable information based on **at least a portion of the first and second texture maps**," as recited in claim 43. The Office provides no factual support to show that Wescott discloses the aforementioned feature. No specific passage of Wescott has been cited in the Office Action regarding this feature of claim 43. Indeed, a close read of Wescott reveals that Wescott is silent as to any disclosure of this feature.

For at least the reasons presented herein, Wescott does not teach or suggest all of the features of claim 43. Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claim 43 under 35 U.S.C. §103(a).

Dependent Claims 44-64

Claims 44-64 ultimately depend from independent claim 43. As discussed above, claim 43 is allowable over the cited documents. Therefore, claims 44-64 are also allowable over the cited documents of record for at least their dependency from an allowable base claim.

Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claims 44-64 under 35 U.S.C. §103(a).

Independent Claim 68

Claim 68, as amended herein, recites (with emphasis added):

> A computer-implemented method for generating a low-distortion area-preserving map for use in stochastic ray tracing computer generated graphics, the method comprising:

projecting sampling patterns onto a three-dimensional surface, the projecting the sampling patterns includes a projection, $(u, v) = S^{-1}(x, y, z)$, that is defined by the composition of at least **two area-preserving bijections**; and

projecting the resulting three-dimensional surface samples into two-dimensional histogram bins.

Applicant respectfully submits that Wescott fails to describe, at least, "the projecting the sampling patterns includes a projection, $(u, v) = S^{-1}(x, y, z)$, that is defined by the composition of at least **two area-preserving bijections**," as recited in amended claim 68. Applicant relies on at least similar reasoning as presented above in support of claim 1, as applied to claim 68. Specifically, Wescott's software displays a map set by selecting **a single projection**; in contrast, the subject Application discloses a method "generating a low-distortion area-preserving map" by "projecting the sampling patterns includes a projection, $(u, v) = S^{-1}(x, y, z)$, that is defined by the composition of at least **two area-preserving bijections,**" as recited in amended claim 68.

For at least the reasons presented herein, Wescott does not teach or suggest all of the features of claim 68. Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claim 68 under U.S.C. §103(a).

Dependent Claim 69

Claim 69 ultimately depends from independent claim 68. As discussed above, claim 68 is allowable over the cited documents. Therefore, claim 69 is also allowable over the cited documents of record for at least its dependency from an allowable base claim.

Accordingly, Applicant respectfully requests that the Office withdraw the rejection of claim 69 U.S.C. 35 § 103(a).

Conclusion

For at least the foregoing reasons, all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application.

If any issues remain that would prevent allowance of this application, **Applicant requests that the Examiner contact the undersigned representative before issuing a subsequent Action.**

Respectfully Submitted,

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